

No.

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**In the Supreme Court of the United States**

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SARAH R. LEE, PETITIONER

*v.*

OHIO EDUCATION ASSOCIATION, ET AL., RESPONDENTS

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*ON PETITION FOR WRIT OF CERTIORARI  
TO THE UNITED STATES COURT OF APPEALS  
FOR THE SIXTH CIRCUIT*

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**CERTIFICATE OF COMPLIANCE**

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I certify that the petition for writ of certiorari contains 7,585 words, excluding the parts exempted by Supreme Court Rule 33.1(d). I declare under penalty of perjury that this certification is true.

Executed on September 28, 2020.

/s/ Jonathan F. Mitchell  
JONATHAN F. MITCHELL  
*Counsel for Amicus Curiae*  
Mitchell Law PLLC  
111 Congress Avenue, Suite 400  
Austin, Texas 78701  
(512) 686-3940  
jonathan@mitchell.law

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